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June 20, 2008

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Honorable Robert W. Sweet United States District Judge United States Courthouse 500 Pearl Street New York, New York 10007

JOINT APPLICATION

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Re:

Service-Universal Distributors, Inc., et al.

v. M/V "SYDNEY EXPRESS", et al.

07 Civ. 3389 (RWS) Our File: 7C-1490

Dear Judge Sweet:

I represent the plaintiffs in this admiralty action which involves damage to shipments of wine which moved in multimodal transport from Australia to New York. This is a joint application by all parties to respectfully request permission to conduct further discovery up to and including September 30, 2008. This is the second application for an extension of the case management deadlines. The additional time is needed to continue efforts to narrow certain factual issues and to complete the discovery with respect to the complete custodial chain of the wine. In addition counsel will continue efforts to explore settlement.

Counsel join in respectfully requesting that the June 26, 2008 discovery deadline be extended to September 30, 2008 with a parallel extension of the pre-trial order deadline to October 22, 2008. The Court's attention is appreciated.

Respectfully

Daid I Mazaral

DLM/jcf

cc:

Cichanowicz, Callan, Keane, Vengrow & Textor, LLP

Attn.: Patrick Michael DeCharles, II, Esq. (Via e-mail: pdecharles@cckvt.com)